



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

June 9, 2006

Certified Mail No. 7005 1160 0000 1550 4304

Mr. Ronald E. Beaumont, VP, GM
Noffsinger Manufacturing Co., Inc.
500 6th Avenue
Greeley, CO 80631

RE: Facility ID No. 083-00058, Noffsinger Manufacturing Co., Inc., Filer, ID
Final Permit Letter

Dear Mr. Beaumont:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-050417 to Noffsinger Manufacturing Co., Inc., in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit transfer application received on July 12, 2005. This permit is effective immediately and replaces PTC No. 1480-0003, issued on September 26, 1991, and PTC No. 083-00058, issued on February 16, 1996, the terms and conditions of which no longer apply. This permit does not release Noffsinger Manufacturing Co., Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Since this project does not significantly change the terms of your permit, DEQ will not contact you regarding a meeting to discuss the terms of the permit. However, if you wish to meet to discuss the permit terms and requirements, you may contact Bill Allred of the Twin Falls Regional Office to schedule a meeting. If a meeting is scheduled, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/NBD/bf

Permit No. P-050417

Enclosures

- c: **Bill Allred, Air Quality Regional Manager, Twin Falls Regional Office**
 Bill Rogers, Permit Coordinator, Air Quality Division
 Natalie DelRio, Associate Engineer, Technical Services Division
 Marilyn Seymore/ Pat Rayne, Air Quality Division
 Laurie Kral, US EPA Region 10
 Permit Binder
 Source File
 Phyllis Heitman (Ltr Only)
 Reading File (Ltr Only)



**Air Quality
PERMIT TO CONSTRUCT
State of Idaho
Department of Environmental Quality**

PERMIT No.: P-050417

FACILITY ID No.: 083-00058

AQCR: 063

CLASS: B

SIC: 3479

ZONE: 11

UTM COORDINATE (km): 696.4, 4715.7

1. PERMITTEE

Noffsinger Manufacturing Co., Inc.

2. PROJECT

Permit to Construct Revision – Facility Name Change

3. MAILING ADDRESS

500 6th Avenue

CITY

Greeley

STATE

CO

ZIP

80631

4. FACILITY CONTACT

Ronald E. Beaumont

TITLE

Vice-President/General Manager

TELEPHONE

(970) 352-0463

5. RESPONSIBLE OFFICIAL

Ronald E. Beaumont

TITLE

Vice-President/General Manager

TELEPHONE

(970) 352-0463

6. EXACT PLANT LOCATION

500 Main Street; Filer, ID 83328

COUNTY

Twin Falls

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Metal coating and allied services

8. GENERAL CONDITIONS

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.


**TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY**

DATE ISSUED: June 9, 2006

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Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
gr	grain (1 lb = 7,000 grains)
HAPs	hazardous air pollutants
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
m	meter(s)
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per year
µg/m ³	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050417

Permittee:	Noffsinger Manufacturing Co., Inc.	Facility ID No. 083-00058	Date Issued:	June 9, 2006
Location:	Filer, ID			

1. PERMIT TO CONSTRUCT SCOPE***Purpose***

- 1.1 The purpose of this permit is to update the facility name, contact information, and responsible official, and to consolidate existing applicable permits.
- 1.2 Table 1.1 is a chronological history of the permits issued at this facility. This PTC replaces all of the PTCs in Table 1.1, the terms and conditions of which no longer apply.

Table 1.1 SUMMARY OF HISTORICAL PERMITS

Permit Number:	Date:
1480-0016	July 1, 1978
1480-0050	April 9, 1991
1480-0050	August 9, 1991
1480-0003	September 26, 1991
083-00058	December 27, 1994
083-00058	February 16, 1996

Regulated Sources

Table 1.2 lists all sources of regulated emissions in this PTC.

Table 1.2 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Vinyl Plastisol Chain Coating	Electrostatic precipitator on cushion coating curing oven
3	Steel Digger Chain Links and Agri-dustrial Machine Parts Fabrication	None

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2. VINYL PLASTISOL CHAIN COATING**2.1 Process Description**

Steel chain links are coated with plastic coating. Bare chain links are pre-heated by induction, passed through a Plastisol liquid dip tank for one minute, and followed by 15 to 18 minutes curing in an oven at temperatures of 300 to 425 °F. Individual links are then assembled into a continuous pattern at room temperature then transferred to storage.

2.2 Emissions Control Description

Particulate emissions from the curing oven shall be controlled by an electrostatic precipitator.

2.3 Stack Specifications**Table 2.1 VINYL PLASTISOL CHAIN COATING STACK SPECIFICATIONS**

Emissions Unit	Emissions Control Device	Emissions Point
Cushion Coating Curing Oven	Electrostatic Precipitator	Cushion coating curing oven stack shall meet the following specifications: Height: 18.5 feet Cross Sectional Area: 1.7 square feet Velocity: 2,650 feet per minutes Temperature – 138 °F

Emissions Limits**2.4 Emissions Limits**

The particulate and lead emissions from the curing oven stack shall not exceed any corresponding emissions rate limits listed in Table 2.2.

Table 2.2 VINYL PLASTISOL CHAIN COATING EMISSIONS LIMITS

Source Description	Particulate		Lead	
	lb/hr	T/yr	lb/hr	T/yr
Cushion Coating Curing Oven	1.5	1.25	0	0

Operating Requirements**2.5 Throughput Limits**

No more than 94.2 pounds per hour or 75.8 tons per year of any coating material, or combination of coating materials, shall be processed.

2.6 Hours of Operation

Hours of operation shall not exceed 1,672 hours per year.

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2.7 Coating Material Contents

No coating materials may be used which contain hazardous ingredients listed in their Material Safety Data Sheets using the definition of hazardous ingredients as those pollutants listed in IDAPA 58.01.01.585 and 586. Nor shall any coating material, or combination of coating materials, be used which emit toxic pollutants in such quantities or concentration as to alone, or in combination with other contaminants, injure or unreasonably affect human or animal life or vegetation as specified in IDAPA 58.01.01.161 (Rules and Regulations for the Control of Air Pollution in Idaho).

Monitoring, Recordkeeping, and Reporting Requirements**2.8 Throughput Monitoring**

The type and amount (in pounds) of coating material used per day shall be recorded and maintained on site for a period of two years and be made available to Department representatives upon request. Material Safety Data Sheets for each raw product used shall also be maintained as part of this record.

2.9 Hours of Operation Monitoring

Hours of operation shall be recorded and maintained on-site for a period of two years and be made available to Department representatives upon request.

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3. STEEL DIGGER CHAIN LINKS AND AGRI-DUSTRIAL MACHINE PARTS FABRICATION**3.1 Process Description**

Steel chain links are fabricated in this process which involves shaping, forming, and tempering. Two natural gas-fired furnaces provide heat for the shaping and forming processes. A quench tank is used for the tempering process. Quenchant is mixed with water in the quench tank and the mixture serves as a bath for the hot steel links. Emissions from both furnaces and the quenchant emissions associated with the tempering process will be released to the interior of the building. Four (4) roof mounted ventilating fans will exhaust all surplus emissions directly to the atmosphere.

3.2 Controls

Emissions released to the atmosphere are uncontrolled.

Emissions Limits**3.3 Emissions Limits**

Emissions of Glutaraldehyde shall not exceed 0.0047 pounds per hour.

Operating Requirements**3.4 UCON QUENCHANT E Throughput Limits**

No more than 11.6 pounds per hour of UCON QUENCHANT E quenchant shall be used.

3.5 UNCONEX 315 Anti-microbial Throughput Limits

No more than 2.58 gallons per month of UNCONEX 315 Anti-microbial quenchant shall be used.

Monitoring, Recordkeeping, and Reporting Requirements**3.6 Quenchant Throughput Monitoring**

The permittee shall monitor and record on a monthly basis the usage of UNCONEX 315 Anti-microbial in gallons per month and the usage of UCON QUENCHANT E in pounds per hour. This information shall be recorded in a log to be kept at the facility for a two (2) year minimum period. The log shall be made available to Department representatives upon request.

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4. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211.01 and 211.03:
 - A notification of the date of initiation of construction, within five working days after occurrence;
 - A notification of the date of completion/cessation of construction, within five working days after occurrence;
 - A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
 - A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
 - A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

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6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.
7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.
9. The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions.
10. All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.
11. The permittee shall not discharge any air pollutant to the atmosphere from any point of emissions for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625.